

UNITED STATES OF AMERICA

V.

JAMES C. THOMPSON,

Defendant.

Docket No. 1:24-cr-82

District Judge Travis R. McDonough

Magistrate Judge Christopher H. Steger

SENTENCING MEMORANDUM

The defendant, James C. Thompson, by and through his attorneys, Lee Davis and Logan Davis, respectfully submits this memorandum for the Court's consideration in imposing sentence. Mr. Thompson has entered a plea of guilty to four counts of Transportation of a Minor in Interstate Commerce with the Intent to Engage in Sexual Activity, in violation of 18 U.S.C. § 2423(a). He has reached a plea agreement with the government under Rule 11(c)(1)(C) for a sentence of 240 months imprisonment. This agreement carefully considers the factors outlined in 18 U.S.C. § 3553(a) and the specific circumstances of this case, striking an appropriate balance between the seriousness of the offenses and Mr. Thompson's individual circumstances.

I. Acceptance of Responsibility and Remorse

Mr. Thompson appeared before Magistrate Judge Christopher H. Steger on September 6, 2024, and entered his guilty plea pursuant to a written plea agreement under Rule 11(c)(1)(C). This plea, offered promptly and without hesitation, reflects Mr. Thompson's sincere desire to accept responsibility for his actions and begin the atonement process. He acknowledges the gravity of his

offenses and the harm he has caused, and he deeply regrets the pain and suffering he has inflicted upon the victims and their families. Mr. Thompson has cooperated fully with the investigation.

II. Mr. Thompson's Background and Current Circumstances

Now 72 years old, Mr. Thompson has lived in Chattanooga, Tennessee. He comes from a respected family, with his father being a decorated World War II Navy doctor who later became a prominent orthopedic surgeon in the community. Mr. Thompson has been a contributing member of society, graduating from the Baylor School in 1970 and earning a bachelor's degree from the University of Tennessee at Chattanooga in 1975. He began his career as a middle school teacher, later transitioning to medical sales, where he found success. He founded his own company, Thompson Medco, LLC, which operated across four states and provided a comfortable living for his family until it became inactive in November 2022.

As detailed in the Presentence Report, Mr. Thompson was subjected to multiple instances of sexual abuse throughout his childhood and adolescence. He was victimized by individuals in positions of trust, including a camp counselor, a neighbor, and a prominent figure in the athletic community. These early experiences of abuse likely had a profound and lasting impact on Mr. Thompson, potentially contributing to the development of his harmful behaviors later in life. While in no way excusing his actions, this history of victimization provides an important context for understanding his offenses and should be considered a mitigating factor in determining his sentence.

Mr. Thompson has been married to his wife, Margaret, for 44 years. They have raised four successful children and are now proud grandparents to nine grandchildren. He has always been a

devoted family man, supporting and caring for his wife, children, and even his elderly parents until their passing in 2005. His family remains important, although the facts of this matter were a complete surprise to his family, and he has strained that support during this difficult time.

It is important to note that the offenses Mr. Thompson pleaded guilty to occurred during a limited period in 1999-2000. Furthermore, in 2001, Mr. Thompson sought guidance and confessed his actions, in this case, to an Episcopal priest, demonstrating an early attempt to confront his wrongdoing and seek spiritual counsel.

Mr. Thompson now faces numerous health challenges that will make his incarceration particularly difficult. He has a history of prostate cancer, requiring surgery in 2008-2009 and resulting in ongoing incontinence. He has undergone multiple back surgeries and suffers from chronic pain. In recent years, he has had both shoulder and knee replacements (2022 and 2023, respectively). He currently has a testicular mass that requires medical attention and a torn rotator cuff. He also manages high blood pressure and sleep apnea. These conditions necessitate a bottom bunk designation and ongoing medical care designation by the court.

III. The Agreed-Upon Sentence

The plea agreement reached with the government for a sentence of 240 months imprisonment serves the multiple purposes of sentencing outlined in 18 U.S.C. § 3553(a). It reflects the seriousness of the offenses while acknowledging Mr. Thompson's acceptance of responsibility, his advanced age, and his significantly deteriorated health. This sentence provides just punishment, promotes respect for the law, affords adequate deterrence to criminal conduct,

protects the public from further crimes of the defendant, and provides the defendant with needed medical care in the most effective manner.

IV. Conclusion

Mr. Thompson respectfully requests that the Court accept the plea agreement and impose the agreed-upon sentence of 240 months. This sentence is consistent with the statutory factors and ensures that justice is served while recognizing the individual circumstances of Mr. Thompson's case.

Respectfully submitted this 16th day of December, 2024.

DAVIS & HOSS P.C.

/s/ Lee Davis

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

This the 16th day of December 2024.

/s/ Lee Davis